



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, NY 10007*

May 10, 2019

**BY ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Santana*, 18 Cr. 865 (VEC)**

Dear Judge Caproni:

On April 16, 2019, the U.S. Probation Office (“Probation”) sent the Government and defense counsel a draft presentence investigation report (“PSR”) for José Santana, the defendant in the above-captioned case. On May 6, 2019, defense counsel submitted several substantive objections to the draft PSR. Probation requested that the Government respond to those objections by May 10, 2019.

Defense counsel’s objections, however, implicate complicated, developing areas law. Accordingly, the Government respectfully requests that it be permitted an additional week—until May 17, 2019—to respond to defense counsel’s objections. The Government further respectfully requests that Probation be permitted to file the final version of the PSR on May 20, 2019.

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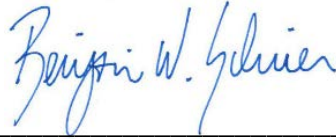
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The Government has consulted with defense counsel and Probation, neither of which object to the Government's requests. Further, unless the Court takes a different view, the Government and defense counsel agree that no further adjustments to the sentencing schedule would be necessary. Thus, the parties would still file their sentencing submissions by June 6, 2019, and sentencing would still take place on June 20, 2019.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney



by: \_\_\_\_\_

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